

ATTACHMENT 15

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Via Electronic Mail

April 26, 2024

Evan Mendelson
Division of Enforcement
Federal Trade Commission
600 Pennsylvania Ave., N.W., Suite CC-9528
Washington, D.C. 20580
emendelson@ftc.gov

Re: *FTC v. Amazon.com, Inc.*, No. 2:23-cv-0932-JHC (W.D. Wash.)

Counsel:

I write on behalf of Amazon.com, Inc. (“Amazon”) in response to your April 3, 2024 email and April 12, 2024 letter regarding Amazon’s production of data.

Amazon is working diligently to collect and produce the extraordinary volume of data requested by the FTC. As Amazon has made clear in correspondence and meet-and-confers dating back to December 2023, your unwillingness to respond to Amazon’s requests for confirmation regarding the data production process—including the fact that you did not respond to Amazon’s repeated questions regarding whether you would accept a sample of data until April 3—has unreasonably delayed Amazon’s efforts to pull and begin producing the requested data.

As we explained previously, we estimate that this full dataset will include data for approximately 250–300 million customers. As we also explained previously, we estimate that this full dataset will be approximately 100 TB. Amazon intends to produce the majority of this data in Parquet format, per your request.

The most efficient method to transfer the data is via a transfer between Amazon’s AWS S3 bucket and the FTC’s S3 bucket.¹ Information for setting up an AWS S3 account can be found at AWS S3 “Getting started” (<https://aws.amazon.com/s3/getting-started>). Once you create an S3 bucket, please provide Amazon with the name and location of your bucket. We will then provide a set of basic instructions to facilitate the data transfer.

Finally, regarding Request for Production No. 73, Amazon will produce monthly volume data for customer service contacts categorized in the ordinary course as relating to the Standard

¹ See Dkt. No. 161, Case Management Order, in *FTC v. Amazon.com*, Case No. 2:23-cv-01495 (ordering that Amazon be permitted to produce large volumes of data to the FTC via AWS S3).

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Issue Codes you identified in your April 3, 2024 email, along with the total number of customer service contacts during each month.

* * *

Please do not hesitate to contact me if you have any questions.

Sincerely,

/s/ Laura Flahive Wu

Laura Kim
John Graubert
John Hall
Laura Flahive Wu
Stephen Anthony
Megan Rodgers